

Exhibit 6

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

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NORTHSTAR AVIATION, LLC, et al., :
Plaintiffs/Counterclaim Defendants, : Civil Action
vs. : No. 1:18cv191-
ALDEN BURT ALBERTO, : TSE-JFA
a/k/a Reno Alberto, :
Defendant/Counterclaim Plaintiff. :
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VIDEOTAPED DEPOSITION OF ALDEN BURT ALBERTO

Leesburg, Virginia

Wednesday, November 28, 2018

10:02 a.m.

Reported by: Elizabeth Mingione, RPR
No.: 44524

1 **companies were set up, Vulcan Management Consulting,**
2 **as well as NorthStar Aviation.**

3 Q. Were you ever an owner of either Vulcan
4 Management or NorthStar?

5 A. **No, I was not.**

6 Q. And I don't want to get too far ahead. You
7 mentioned an embezzlement scheme by I think Fouad is
8 his name?

9 A. **Fouad and his cohorts. Yes.**

10 Q. What was that, just generally, what was the
11 scheme?

12 A. **In general, I mean, it -- it -- I'll give**
13 **an example. We had about 65 employees there. And as**
14 **an employee was hired, the company bought a car for**
15 **them. Every employee, for every employee that we had,**
16 **they purchased a brand new car. And to me that didn't**
17 **make any financial sense, you know, from that**
18 **perspective.**

19 **So I did a little bit of digging. You**
20 **know, I actually went to the car -- and they went to**
21 **the same car dealership every time. And it didn't**
22 **take much. I talked to one of the salesmen, and I**

1 Sheikh Dr. Bin Saif?

2 **A.** **Yeah. I refer to him as Sheikh Ahmed.**

3 **Q.** Sheikh Ahmed. And I'll --

4 **A.** **A-H-M-E-D.**

5 **Q.** Was he -- was he or his companies a hundred
6 percent owner of Vulcan?

7 **A.** **Yeah. When you trace it back to him, it
8 was either his or companies were -- I'm sorry. He or
9 his companies were a hundred percent owner of Vulcan.**

10 **Q.** And is the same true of the ownership for
11 NorthStar?

12 **A.** **It is.**

13 **Q.** Okay. And I think I asked you this, you
14 have never been an owner of Vulcan or NorthStar?

15 **A.** **I have not.**

16 **Q.** Did the two companies come into existence
17 around the same time? I'm just trying to understand
18 the relationship between Vulcan and NorthStar north.

19 **A.** **Yes. So, as I said, I was responsible for
20 the orderly liquidation of R2. I had -- I was given a
21 about 30, 34 million dollars to start a new company,
22 including the cash and assets remaining from the R2 --**

1 compensation, some other financial documents that he
2 wanted, and a lot of those answers and responses were
3 provided by Ali. And there's e-mail threads on it in
4 the discovery. So he was providing all the
5 information that he needed. But it was a little bit
6 suspicious to me because after five, six years, there
7 had never been a board meeting.

8 He, from the very early stages of our
9 relationship in the business, you know, he wanted to
10 dispense with all those formalities; although I kept
11 him apprised, you know, all the time of the financial
12 conditions and the status of the contract, et cetera.
13 So at this board meeting, he stayed maybe less than
14 ten minutes for something that, you know, he says was
15 critical and important information that he needed.
16 Board meeting lasted about an hour. And there were --
17 the people in attendance were Hani Farag, which was
18 his personal finance person, the sheikh, for about ten
19 minutes, myself, Ali, NorthStar's CFO, as well as
20 Jalal Mohammed, a Deloitte -- the senior auditor from
21 Deloitte Touche.
22 And I had concerns about going to the board

1 **but, you know, he -- it was definitely a material**
2 **breach of our agreements.**

3 Q. And what agreements are you referring to?

4 A. Well, you know, our business relationship
5 was memorialized in a services agreement between
6 Rotana Jet and R2, or Newco, as it was referred to as
7 well, which was eventually NorthStar, dated December
8 4, 2011.

9 Q. In what capacity did you enter that
10 December 4, 2011 document that you are referring to?

11 A. In what capacity? Well, as CEO of Reflex
12 Responses, CEO of Newco, or eventually NorthStar, CEO
13 of Vulcan Management Consulting.

14 Q. Not as owner of any of those?

15 A. Not as owners.

16 Q. And what is the significance of this
17 December 4, 2011 document that you executed as CEO of
18 R2?

19 A. I think why it's important, Ellis, it
20 really captures the intent of our initial business
21 relationship. You know, profits were supposed to be
22 split 80/20; 80 percent going to the manager who was

1 NorthStar, or Newco, 20 percent to the shareholder.
2 And that was on net profits. And essentially one of
3 our agreements when I started the company is that I
4 would run the company, run the company both
5 financially and operationally without limitation. The
6 only thing I couldn't do was sell the company. And it
7 was really a business opportunity that I presented to
8 the sheikh.

9 I brought him in. I asked him to be my
10 sponsor after -- after interviewing several potential
11 sponsors. I secured the funding. I staffed it. I
12 took the enormous risk in actually signing this
13 contract, and had all the liability. You know, the
14 sheikh provided zero capital, aside from the \$40,000
15 that he used to -- 40,000 U.S. dollars that he used
16 especially that was a requirement to -- to open the
17 company up. And, you know, he did nothing.

18 He provided, you know, he provided no
19 assistance as far as opening any doors in the UAE,
20 which was one of the things I asked him to do to get
21 other contracts. Essentially he was an absentee owner
22 for five, six years.

1 Q. You've mentioned there was an 80/20 split
2 under your December 4, 2011 agreement that involved
3 Reflex Responses. The manager under that agreement
4 was the company R2, correct?

5 **A. Initially, yes.**

6 Q. Did that ever change?

7 **A. As far as?**

8 Q. Did the manager under the December 4, 2011
9 agreement ever change from someone other than the
10 company R2?

11 **A. It was understood that R2 would eventually
12 morph into Newco, which was eventually NorthStar.**

13 Q. And you were not an owner of R2?

14 **A. I was not an owner of R2.**

15 Q. And you never had that --

16 **A. I've never been an owner of R2.**

17 Q. So the 80/20 split you mentioned was an 80
18 percent split to the company R2?

19 **A. Yes, to the -- to the manager. Yes.**

20 Q. Okay. And you were the managing director
21 under that agreement?

22 **A. I was the manager. I was managing**

1 So we were talking about summer, fall, of
2 2017, shortly before we went on break. And you
3 mentioned what you thought about the situation. And I
4 appreciate the explanation. I've also seen used in
5 this case -- and I think in some of your interrogatory
6 answers, and also the Vulcan deposition, reference to
7 a Plan B.

8 My first question is what was Plan B?

9 **A. Discussions with the sheikh sometime in**
10 **2017 or earlier. He discussed possibilities of**
11 **closing down U.S. operations, you know, once the**
12 **contract was delivered. I had to explain to him that**
13 **one of the requirements for the licensing is that**
14 **NorthStar USA had to exist because NorthStar UAE was a**
15 **foreign-owned corporation and couldn't apply for ITAR**
16 **licensing. And -- I'm sorry, I just lost track.**
17 **Could you repeat the exact question.**

18 **Q. Yeah. My question essentially is what was**
19 **Plan B?**

20 **A. So after -- as I discussed earlier, I was**
21 **made aware of that PowerPoint to oust me as CEO, close**
22 **down the USA office. And my concern was for employees**

1 having jobs, and the desire to continue operations in
2 the U.S. both personally and for employees. So Plan B
3 was to set up a new company, either set up a new
4 company, or have the ability to continue run NorthStar
5 USA possibly independently from -- from NorthStar UAE.
6 Those were the thoughts that were going through my
7 mind to continue operations for NorthStar USA.

8 So Vulcan Aviation was formed with that
9 intent as a Plan B. In the event that the sheikh
10 closed down U.S. operations, I would be able to
11 provide jobs to a lot of loyal employees that we've
12 had for, you know, several years.

13 Q. So after you saw the PowerPoint
14 presentation, you took steps to form Vulcan. What did
15 you do to do that? What steps did you take?

16 A. Well it wasn't, you know, it wasn't until
17 the sheikh revoked -- wrongfully revoked my power of
18 attorney. I believe that was October 17, that I
19 actually -- or excuse me. That was October 19, I
20 believe, is when my revocation of power of attorney
21 was actually signed, that I set up Vulcan Aviation as
22 that Plan B.

1 Q. After you received the revocation of power
2 of attorney?

3 A. There were discussions, I believe, before
4 that to potentially do that, in the event, you know,
5 he decided to close U.S. operations. After he revoked
6 my power of attorney, that's kind of what triggered,
7 you know, my desire to set up Vulcan.

8 Q. Now, at some point you resigned from
9 NorthStar Aviation. And I've seen a couple
10 resignation documents in the file.

11 Can -- first of all, when did you resign?

12 MR. JOHNSON: Objection to form. Which
13 entity?

14 A. I resigned as CEO for NorthStar UAE, as I
15 recall, October 24, 2017.

16 Q. And when did you resign from NorthStar USA
17 as CEO?

18 A. I resigned from NorthStar USA as CEO, I
19 believe it was November 6, 2017.

20 Q. And how do you distinguish between
21 resigning from one role versus the other role?

22 A. Can you clarify?

1 Q. As I understand it, you were CEO of both
2 NorthStar UAE and NorthStar USA simultaneously,
3 correct?

4 A. Yeah. I was -- if I may.

5 Q. Sure.

6 A. I was CEO of NorthStar UAE. I was managing
7 director of UAE. I was a board member of UAE. I was
8 a manager of NorthStar USA. I was a CEO of NorthStar
9 USA.

10 **NorthStar USA was a subsidiary of NorthStar**
11 **UAE, but a separate company.**

12 Q. And as I understand it, your position is
13 that you resigned only from NorthStar UAE on October
14 24?

15 A. **Yes.**

16 Q. And as I understand it, your position is
17 that you resigned as a board member and an employee
18 and CEO of UAE on October 24?

19 A. **No. That's not true.**

20 Q. Okay.

21 A. **As you mentioned, I only resigned as CEO of**
22 **NorthStar UAE on October 24. And I was -- resigned**

1 12th of October?

2 **A. Right.**

3 Q. And it's I think the fifth one up. Do you
4 have any understanding of what that transaction is?

5 A. No. I mean, Ali had access to the account,
6 obviously. And his name is referenced there on that
7 line. So he was making online transactions.

8 Q. I'm going to ask you to flip over to the
9 next page. There's a transaction on the 19th of
10 October of 2017. It says it's an online transfer to
11 Alberto A Way2Save Checking, with an account ending in
12 589 of \$550,000.

13 Do you recognize what that transaction is?

14 A. I do.

15 Q. And what is that transaction?

16 A. It's a transaction to myself for \$550,000.

17 Q. And --

18 A. To my savings.

19 Q. Okay. And what --

20 A. Or, I'm sorry, my checking account.

21 Q. Why was that transaction made on the 19th
22 of October?

1 A. I made that transaction because I was
2 informed by the bank manager that someone was trying
3 to access the NorthStar accounts illegally, and that's
4 what locked out access to the account on line. I met
5 with the bank manager in person. She also said that
6 someone from NorthStar was trying to either close the
7 account, withdraw money, you know, that wasn't
8 supposed to have access to these accounts.

9 So, you know, you've got to understand my
10 mind set, again, is that -- so what I did was in order
11 to protect that money. And that's why I transferred
12 it to my savings account -- or checking account.

13 Q. And was that money ever transferred back to
14 NorthStar?

15 A. It was not.

16 Q. Did the money remain in your personal
17 assets in your personal account?

18 A. I believe so. I, you know, when you look
19 at the -- when you look at the big picture is -- in my
20 mind set at the time, like I said, I was a founder of
21 NorthStar Aviation UAE. The sheikh just revoked my
22 power of attorney, blocking access to all bank

1 Q. Virginia. On the 25th of October there was
2 it looks like a \$500,000 transfer into the account
3 from NorthStar Aviation USA, LLC, platinum savings
4 card.

5 Do you have an understanding of what that
6 transaction was connected with?

7 A. **No, I don't.**

8 Q. Did NorthStar Aviation USA have a platinum
9 savings card, a credit card?

10 A. **Yes.**

11 Q. Is that the account we talked about
12 earlier? Is that a different account?

13 A. **I would have to check the numbers, but I
14 believe so. There was only one card.**

15 Q. So do you have any reason to think that you
16 did not make that \$500,000 transaction on the 25th of
17 October?

18 A. **October 25. Let's see. Well, Ali had
19 access to this account, but I believe he was still
20 incarcerated in jail so -- by the sheikh. So October
21 25, it could have been me, but I don't -- I don't
22 remember.**

1 Q. And looking down on the 26th of October
2 there was another transfer, a similar transfer from
3 that same account into this checking account for
4 \$42,000, and then another one on the 27th of October
5 for \$30,000.

6 Do you recognize either one of those
7 transactions?

8 **A. I believe those were for travel expenses
9 for previous travel that I've -- that I did.**

10 Q. And I'm not quite following. So these are
11 deposits into this account. So who was putting the
12 money in there, in these amounts of -- were you -- did
13 you transfer this money to the credit card? I'm just
14 not quite sure what's going on with those
15 transactions.

16 **A. On line transfer from NorthStar Aviation
17 business platinum savings. From a savings account to
18 this account.**

19 Q. So all of these transactions were deposits
20 from the savings account to this account?

21 **A. The NorthStar savings account to the
22 NorthStar checking account, if I'm reading this**

1 **correctly. Yes. And I believe those were**
2 **reimbursements for travel expenses I had. And because**
3 **I was without a CFO, I probably made those transfers.**

4 Q. And then there's an outgoing transfer on
5 the 26th of October 2017 in the amount of \$525,000.

6 Do you have a -- recognize what that
7 transaction is?

8 **A. Yes. That was an IRS tax payment for**
9 **federal taxes.**

10 Q. For you?

11 **A. For myself.**

12 Q. Okay. And did you make that transaction?

13 **A. I made that transaction. Again, in the**
14 **absence of my CFO, Ali, I made that transaction**
15 **directly. Otherwise it would have gone through the**
16 **process of filing a -- an expense or an e-mail --**
17 **expense report or e-mail through Ali, him approving**
18 **it, and then depositing the money in the appropriate**
19 **accounts.**

20 Q. On the 26th of October, there was an
21 outgoing transfer to -- it looks like your checking
22 account in the amount of a \$42,574.77, which matches

1 one of the incoming transfers.

2 **A. Right.**

3 Q. Do you recognize what that 10/26, \$42,000
4 transaction was?

5 **A. As I stated earlier, I believe that was for
6 both transactions for were for travel reimbursement.**

7 Q. And on the 27th of October, flipping over
8 to the next page, there was an \$85,000 transaction.
9 The description says business to business, ACH debit,
10 Virginia Department of Taxation payment, Alden
11 Alberto.

12 Do you have any recognition of what that
13 transaction was?

14 **A. Yes. It's to Virginia Department of
15 Taxation, a tax payment to Virginia.**

16 Q. And did you make that transaction?

17 **A. 10/27. Let's see. I can't remember when
18 Ali was actually released from jail, but I -- if he
19 was, he would have made it; if not, it was me.**

20 Q. And it was made to pay your taxes?

21 **A. Yes.**

22 Q. Okay. And on the 30th of October 2017,

1 there's an online transfer, the description is online
2 transfer, reference some numbers and to business card
3 in the amount of \$11,211.30. do you recognize that
4 transaction?

5 **A. Where are you looking, Ellis?**

6 **Q. It's the last October 30 transaction.**

7 **A. It looks like an online payment to pay off**
8 **the NorthStar business card.**

9 **Q. And then the very last transaction on this**
10 **statement on October 31, which is described as**
11 **withdrawal made in a branch store in the amount of**
12 **\$19,300.95, do you have any recognition of that**
13 **transaction?**

14 **A. Yes. I believe that was the final**
15 **withdrawal to close the account.**

16 **Q. And did you make that withdrawal?**

17 **A. I made that withdrawal.**

18 **Q. And what became of that \$19,300.95?**

19 **A. I don't remember specifically, but I made**
20 **that withdrawal, personal withdrawal.**

21 **Q. Did you keep that money?**

22 **A. Yes.**

1 Q. And after that transaction the account
2 balance was actually slightly negative at minus 58
3 cents?

4 **A. That's correct.**

5 Q. And did you, after October 31, 2017, make
6 any other transactions that you are aware of on the
7 checking account?

8 **A. Not that I'm aware of. No.**

9 Q. So in flipping over now to the savings
10 account, which I'm assuming the savings account and
11 checking account are linked on online banking?

12 **A. Yeah. I assume so.**

13 Q. And I think that means that the transaction
14 to switch money from one account to the other is as
15 simple as making a click on the computer. Is that
16 seem accurate --

17 **A. Yes.**

18 Q. -- to your knowledge?

19 **A. Yes. If you have appropriate access, yes.**

20 Q. And did you have access to do that?

21 **A. I had access. Ali had access.**

22 Q. Did anyone else that you are aware of have

1 access to do that?

2 **A. I believe Marwan had access while he was
3 employed.**

4 Q. He wasn't employed at this time though, was
5 he?

6 **A. No. While he was employed.**

7 Q. Okay. Understood. Anyone else at this
8 time in October 2017 that had online banking --

9 **A. No.**

10 Q. -- access? So the first transaction that I
11 see --

12 **A. Where are you looking now?**

13 Q. The first -- it's page 738, if you look at
14 the numbers on the right-hand corner.

15 **A. Okay.**

16 Q. So there's a transaction on the 24th of
17 October in the amount of \$170,000 -- \$117,500.
18 \$117,500. Sorry.

19 Do you have any recognition of what that
20 transaction is?

21 **A. Electronic transfer from checking. So
22 basically moving money from checking to savings.**

1 Q. Okay.

2 **A. Both business accounts.**

3 Q. Okay. And then on the 24th of October
4 there's a large deposit of a million dollars, slightly
5 over a million dollars, made into the savings account.

6 Do you have any recognition of what that
7 transaction represents?

8 **A. I -- I don't remember that, Ellis. It**
9 **could have been a transfer or, I mean, taking it from**
10 **one account to another, but I don't remember that**
11 **transaction.**

12 Q. And the next transaction I'm curious about
13 is the very last one on October 31. It says
14 withdrawal made in branch store of \$602,425.23.

15 Do you recognize that transaction?

16 **A. Yes. That was a transaction to close the**
17 **account.**

18 Q. And what became of that \$602,000?

19 **A. That \$602,000 was transferred most likely**
20 **to my personal as a holding place. As I told you, you**
21 **know, I was looking at Plan B, looking to continue**
22 **operations in the USA, and possibly moved that into**

1 **Vulcan.**

2 Q. And did that -- did you keep that money?

3 A. **Vulcan remained a shell company, so I took**
4 **that as a return on investment or dividend.**

5 Q. So where is that \$602,000 now?

6 A. **I believe in a bank account, personal bank**
7 **account.**

8 Q. Did you ever offer to give that \$602,000
9 back to NorthStar?

10 A. **NorthStar UAE?**

11 Q. Either NorthStar UAE or NorthStar USA?

12 A. **No.**

13 Q. Why not?

14 A. **Well, as I told you, you know, my mind set**
15 **is -- is the sheikh -- the sheikh wrongfully**
16 **terminated my power of attorney. We had business**
17 **agreements to, you know, to run NorthStar UAE and**
18 **NorthStar USA, where I was responsible for managing**
19 **all operations and making all the financial decisions.**

20 **He was going to be a silent owner, totally inactive.**

21 **And, you know, he -- as I told you earlier,**
22 **in October 2017 he revoked my power of attorney, took**

1 all access to the bank accounts. And in the meantime
2 we still have agreements in place where I'm still owed
3 a substantial amount of money from the performance
4 bond, at least half of that. And, you know, so I was
5 in damage control mode at that point. I don't like --
6 excuse me.

7 Q. Did anyone from NorthStar ever give you
8 permission to keep either that \$600,000 or the prior
9 \$500,000 that was taken from the checking account?

10 A. No. I had the authority to do so. I was
11 the CEO of NorthStar.

12 Q. But it was NorthStar's money, not yours,
13 right?

14 A. It was NorthStar's money. But in the end,
15 I took it as a owner's dividend or owner's return on
16 investment.

17 Q. And you converted that money to your
18 personal money?

19 A. Yes.

20 Q. In September 2017, as I understand it,
21 there was some talk or discussion about a potential
22 new contract related to Iraq and Afghanistan. Do you

1 signature on it, that is essentially my approval that,
2 you know, the financials, the financials are good.
3 And there's nothing that would basically highlight any
4 issues with the financials. And he said I sign every
5 one of those every single year.

6 And when he was doing the financials for
7 2016, which was obviously in 2017, he said the assets
8 -- and I'm just kind of paraphrasing what Ali told me
9 that Jalal Mohammed was telling the sheikh, is that
10 the company's solvent. It's on solid financial
11 footing. Assets cover liabilities three to one.

12 And Reno, because of his power of attorney,
13 had the power and authority to run the company as he's
14 been doing. He had -- there were no issues. And so
15 -- did that answer your question?

16 Q. Yes, it did. But speaking of the
17 financials, at any point before you gave yourself a
18 bonus, did you call a board meeting?

19 A. No. I didn't have to. I was -- I had the
20 full authority to issue my compensation, but it was
21 still a process just, you know, it was still a process
22 where I would confer with Ali. Ali would tell me the

1 Exhibit Number 19.)

2 - - -

3 BY MR. BENNETT:

4 Q. Mr. Alberto, you were just referencing a
5 board resolution. Is Exhibit 19 that document that
6 you just testified about?

7 A. **Yes.**

8 Q. So is this the board resolution?

9 A. **This is the document I was referring to.**

10 Q. Okay. Again, specifically I'm looking at
11 the second page that says Board Resolution at the top.
12 And there's a date on it that says the board
13 resolution was unanimously approved on June 29, 2017.

14 Do you see that?

15 A. **Yes.**

16 Q. And you signed this. Do you recognize your
17 signature?

18 A. **Yes.**

19 Q. Was a board meeting called to pass this
20 resolution?

21 A. **No. I didn't need a board meeting to**
22 **approve a dividend payment to the sheikh. I had full**

1 We did that for Bahrain, where we had
2 difficulty. We were initially denied. And over a
3 two-year period, after about two years, we were
4 actually able to get the State Department to rescind
5 and allowed us to basically to resubmit licensing and
6 we were approved.

7 So, it was a loft politicking and trying to
8 get support for providing armed helicopters to
9 different countries. And --

10 Q. Go ahead. I'm sorry.

11 A. And my other primary role was -- that I
12 took was marketing, visiting -- basically doing
13 high-level meetings in various countries to find out
14 what the requirements were and hopefully potentially
15 submit a bid, or sometimes an unsolicited proposal, to
16 establish ourself in that country and sell them light
17 attack helicopters.

18 Q. And we'll get back into that a little bit.
19 And I may have asked you this, and if I did, I
20 apologize, but during the time you were CEO, did you
21 ever call a board meeting?

22 A. I never called a board meeting.

1 Q. And during the time you were CEO, did you
2 ever call a general assembly?

3 A. I never called a general assembly. And,
4 you know, very early on the sheikh made it clear that
5 he wanted to dispense with those formalities. He
6 didn't even want a board. He suggested that we get
7 prominent businessmen in the UAE that would have
8 influence that would possibly help us and assist us
9 with getting new business, and he said -- he declined
10 to do that.

11 Q. Your efforts on Capitol Hill, essentially
12 the lobbying efforts is what I'll call them, who
13 assisted you with those? I think I've seen Akin
14 Gump's name associated --

15 A. Yeah. Akin Gump was -- took a primary role
16 in helping me set up those meetings, as well as a
17 person named April Redman who worked at the Department
18 of Commerce and assisted me getting meetings and calls
19 with countries that -- that I had met with, at least
20 here in their embassies.

21 Q. And who specifically at Akin Gump did you
22 work with?

1 **so I didn't see that as competing with a**
2 **company that may or may not exist.**

3 Q. You have mentioned a few times during your
4 testimony about a desire to keep the people who work
5 for NorthStar Aviation in employment in some capacity.
6 What led to the layoffs in summer of 2017 of Lyle
7 Becka, for instance? And there were several others.
8 I think Hani was part of that and Marwan.

9 What led to those layoffs in the summer of
10 2017?

11 A. **It's just the nature of the aviation**
12 **business. You know, employment levels at all aviation**
13 **companies, I mean, Bell fired -- laid off 2,500 people**
14 **a couple years ago because of lack of contracts. And**
15 **we were going through a similar thing. We had -- you**
16 **know, aviation companies grow when they have got**
17 **contracts, and they shrink when they don't.**

18 **And we were going through that period where**
19 **we had to make some layoffs and, you know, that was a**
20 **hard decision, but I had -- it had to be done.**

21 Q. And during that same month that you laid
22 those people off, you took a 4.5 million dollar

1 payment, correct?

2 A. Yes. As per my agreement with the sheikh.

3 He only took his dividend payment as well.

4 Q. And you gave several other large bonuses to
5 other employees. For instance, you gave Terry Key I
6 think \$300,000 in that same month you paid off these
7 people?

8 A. As it's not only a bonus for performance,
9 but it's an incentive to retain key people. Terry was
10 -- everyone I paid there was a key person. Because at
11 the end of the day, NorthStar doesn't own anything.
12 We integrate commercial off-the-shelf products.

13 We don't own any intellectual capital or
14 IP. That's owned by all our subcontractors. So, you
15 know, at the end, all we have are employees. And
16 because everyone -- it was very well-known that we
17 were on the tail end of our contract. If all these
18 key employees left, there wouldn't be anything left of
19 NorthStar.

20 So, yes, I had to make a hard decision, lay
21 off people. At the same time, I needed to retain
22 certain people, certain key people that I felt were

1 ACKNOWLEDGMENT OF DEPONENT

2

3 I, _____, do hereby

4 acknowledge that I have read and examined the

5 foregoing testimony, and the same is a true, correct

6 and complete transcription of the testimony given by

7 me, and any corrections appear on the attached Errata.

8 Sheet signed by me.

9

ALDEN BURT ALBERTO

12

13 NOTARIZATION (If Required)

14 State of

15 County of

16 Subscribed and sworn to (or affirmed) before me on

17 this day of 20 by

¹⁸ . . . proved to me on the

¹⁹ basis of satisfactory evidence to be the person who

20 appeared before me

21 Signature:

22 (Seal)

02 220 4158

Henderson Legal Services, Inc.

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1 C E R T I F I C A T E

2 UNITED STATES OF AMERICA)

3 ss:

4 COMMONWEALTH OF VIRGINIA)

5 I, ELIZABETH MINGIONE, Notary Public within
6 and for the Commonwealth of Virginia do hereby
7 certify:

8 That the witness whose deposition is

9 hereinbefore set forth was duly sworn, and that the
10 within transcript is a true record of the testimony
11 given by such witness.

12 I further certify that I am not related to
13 any of the parties to this action by blood or marriage
14 and that I am in no way interested in the outcome of
15 this matter.

18

19

30

29 Notarized Registration No. 104110

21

22 May 31, 2019

202-220-4158

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